UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

October 24, 2002

Glenna Clark
BRAC Operations, Code 06CA.GC/0718
Department of the Navy, Southwest Division
Naval Facilities Engineering Command
1230 Columbia Street, Suite 1100
San Diego, CA 92101

RE: Draft Project Plans, Removal Actions for Parcels 79, 98, 105, 106 and 107, Alameda Point

Dear Ms. Clark:

EPA has reviewed the above referenced project plans for removal of the water and antennae towers and footings at Alameda Point and the clean up of the surrounding impacted soil. The document was prepared by IT Corporation and submitted by the Navy to the regulatory agencies on August 20, 2002. Please call me at (415) 972-3029 if you have any questions regarding EPA's enclosed comments.

Sincerely,

Anna-Marie Cook

Anna-Marie Cook
Remedial Project Manager

enclosure

cc: Michael McClelland, SWDiv
Andrew Dick, SWDiv
Marcia Liao, DTSC
Judy Huang, RWQCB
Elizabeth Johnson, City of Alameda
Lea Loizos, Arc Ecology
Rezsin Jaulus, Alameda Point Collaborative
Karla Brasaemle, TechLaw Inc

EPA Review of the Draft Project Plans, Removal Actions for Parcels 79, 98, 105, 106, and 107, Alameda Point, Alameda

GENERAL COMMENTS

1. The contaminants of concern (COCs) are presented differently in the Draft Work Plan for the removal actions (WP) and the Sampling and Analysis Plan (SAP). In the WP, the text states that the COCs are chromium and lead, but in the SAP, the COCs are chromium, lead and cadmium. Furthermore, the action levels for both chromium and hexavalent chromium are cited in the SAP, but only chromium is discussed in the WP. Please resolve these discrepancies.

2. While we did not review the site safety plans, the Work Plan does not appear to explicitly take the safety of children into account. The parcels where excavation and demolition will be done are in close proximity to a residential area. Children are often drawn to activity, particularly if heavy equipment is involved. Using banner tape to delineate exclusion zones or signs to warn people to keep away or to control traffic are not likely to be effective restraints for children. Please use physical barriers such as fencing to ensure that children can not enter these parcels when work is being done, excavations are open, or equipment is present.

3. The waste profiling composite samples will be analyzed for volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), pesticides and polychlorinated biphenyls (PCBs), and the California Assessment Manual (CAM) 17 metals. The waste profiling results should be reviewed, and if VOCs, SVOCs, pesticides, PCBs or other metals are detected at concentrations above the USEPA Region IX preliminary remediation goals (PRGs) or an applicable state standard, the potential source of the detection in the excavated area may need to be evaluated. Please discuss how unexpected detections in the waste profiling composite samples will be handled.

4. The text references a central stockpiling area, but there are no details that explain how the stockpiling area will be constructed. Please provide details that explain how the soil stockpiling area will be constructed, including a discussion of how soil stockpiles will be segregated until after the waste profiling sample results are received.

5. The text does not discuss dust control or surface water run-on/run-off control measures. Please specify dust control procedures, including dust control at soil stockpiles and also specify surface water run-on/run-off control measures.

6. The action level cited for chromium, 0.2 milligrams/kilogram (mg/kg) (e.g., in the Work Plan sections that discuss confirmation sampling [5.X.3]), is actually the action level for

hexavalent chromium, not trivalent chromium. The action level for total chromium, 210 mg/kg, is listed in the SAP (Section 2.3.1), but this action level is not included in the Work plan. If hexavalent chromium is a concern for soils, then the word "chromium" should be replaced with "hexavalent chromium" when the 0.2 mg/kg action level is cited. Please clearly state whether chromium or hexavalent chromium or both are the concern for soil. Also, please clarify in the work plan if soil analyses will include hexavalent chromium.

SPECIFIC COMMENTS

1. **Section 3.4.2, Building Protection, Page 3-2:** The text indicates that work may be done "on weekends when the buildings are not occupied," but this does not take the nearby residential areas into account. Please consider the potential impact of demolition and construction on residents during weekends.

2. **Section 4.1.3, Concrete Foundations and Subsurface Features, Page 4-2:** The text states that "concrete foundations will be demolished and disposed of at an appropriate facility" and that "it is assumed that all debris generated can be disposed of as non-hazardous construction debris," but the disposal facility is not specified and it is not clear why the assumption can be made that the debris is non-hazardous. It is also unclear if sampling will be done to ensure that the concrete is non-hazardous or if the intent is to simply do a visual inspection and then sample if there is visual evidence of contamination. Please specify the disposal facility and discuss why it is assumed that the debris is non-hazardous, including whether the concrete will be sampled or not.

3. **Section 5.1, Permits and Notifications, Page 5-1:** The text states that "IT will notify DTSC of removal actions," but under the Federal Facility Agreement EPA must also be notified.

4. **Section 5.7, Soil Removal at Parcel 107, Page 5-8:** The description of the soil removal at Parcel 107 does not match Figure 7. The first sentence states "parcel 107 has three adjacent areas that combine to form one large excavation," but there are actually two excavations to be completed in this parcel, one in the vicinity of tank S61 and the other in the vicinity of tank S88. Then, the description of the area on Figure 7 describes three squares or rectangles (30 feet by 50 feet, 40 feet by 20 feet, and one 10 feet by 10 feet), but the figure appears to show two adjacent rectangles, one 42 feet by 77 feet and the other 67 feet by 32 feet. The text then states that "these areas are beneath the former Water Tower 088," but the area beneath former Water Tower 088 is described on page 5-9. Please resolve these discrepancies.

5. **Section 6.2.2, Protection of Air Resources, Page 6-2:** The text does not mention sound level monitoring, which should be done because of the proximity of these removal actions

to residences. Please include sound level monitoring.

6. **Section 6.2.3, Stormwater Resources, Page 6-4:** The text briefly describes construction of the soil stockpile area, but does not discuss or mention how the stockpiles from different excavations will be separated physically and how the runoff from other stockpiles will be prevented from contaminating adjacent stockpiles. Stockpiles should be separated until the analytical results from the waste profiling samples are evaluated. Also, it may be necessary to construct a sump so that runoff can be collected and removed from the soil stockpile area. Please revise the text to describe how stockpiles will be separated and to discuss whether a sump is necessary to collect runoff.

7. **SAP, Section 2.1, Stating the Problem, Page 2-1 and Section 2.2, Identifying the Decisions, Page 2-1:** The text is not consistent in identifying the COCs. In the first sentence of the second paragraph of Section 2.1 and in the first bullet of Section 2.2, the text states that the COCs are lead, cadmium and chromium, but in the last sentence of the second paragraph, only lead and chromium are listed. Please resolve this discrepancy.

8. **SAP, Section 3.1, Excavation Sampling, Table on Page 3-1, Table 2 and Figure 7:** Based on Figure 7, there are 26 grid squares, including the square north of the northwest corner of the main part of the excavation, but the tables only indicate that 25 confirmation samples will be collected. It is not clear why 26 confirmation samples were not proposed. Please revise the text and tables to indicate that 26 confirmation samples will be collected from Area 106.

9. **SAP, Section 3.3.1, Waste Soil, Page 3-3:** The list of analytes and methods is different than the analytes and methods proposed for Waste Profiling in Section 5 of the Work Plan. The source of soil is the same, so the analytes and methods should also be the same. Please resolve the discrepancies between the lists of analytes and methods in the Work Plan and SAP.

10. **SAP, Table 2:** Table 2 indicates that a single sample will be collected from each parcel for waste profiling, but the text that describes waste profiling for each parcel in Section 5 of the Work Plan indicates that two composite samples of the stockpile from each parcel will be collected for waste profiling. The approach proposed in the Work Plan is more likely to result in detection of soil that would need disposal in a higher class facility. Please revise Table 2 to match the Work Plan, and specify that two composite samples will be collected for waste profiling of the stockpile from each parcel.

11. **SAP, Table 4:** Table 4 does not include analysis of hexavalent chromium in water. Please add hexavalent chromium to the list of analytes beneath the subheading "Water." Also, please add a note to the text that the holding time for aqueous hexavalent chromium samples is only 24 hours and discuss the impact of this short holding time on sample shipping.

MINOR ISSUES

1. **Section 6.2.3, Protection of Surface and Groundwater Resources, Page 6-3:** Please replace the word "soul" with "soil" in the first sentence.